

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ALBEMARLE CORPORATION,

Plaintiff,

v.

OLIN CORPORATION,

Defendant.

Civil No. 1:23-cv-600

**DEFENDANT OLIN CORPORATION'S MOTION FOR A MORE DEFINITE  
STATEMENT OR, IN THE ALTERNATIVE, FOR RECONSIDERATION**

Defendant Olin Corporation ("Olin"), by counsel, pursuant to Fed. R. Civ. P. 12(e), hereby moves for a more definite statement or, in the alternative, for reconsideration of this Court's decision denying Olin's motion to dismiss. The Complaint filed by Albemarle, over the course of briefing on the motion to dismiss, has manifested insurmountable ambiguity that frustrates Olin's ability to prepare an Answer consistent with its obligations to admit or deny allegations in good faith. Olin submits the attached Memorandum in support of its motion.

Dated: July 11, 2023

Respectfully submitted,

/s/ Robert G. Lian

Corey W. Roush (*pro hac vice*)

Robert G. Lian (36406)

AKIN GUMP STRAUSS HAUER & FELD  
LLP

2001 K Street, N.W.

Washington, DC 20006

Tel: (202) 887-4115

croush@akingump.com

blian@akingump.com

*Counsel for Defendant Olin Corporation*